

LAW OFFICES  
**GREENBLUM & BERNSTEIN, P.L.C.**  
PATENT, COPYRIGHT AND TRADEMARK MATTERS  
1950 ROLAND CLARKE PLACE  
RESTON, VA 20191-1411  
TEL: (703) 716-1191  
FAX: (703) 716-1180  
EMAIL: [gbpatent@gbpatent.com](mailto:gbpatent@gbpatent.com)  
[www.gbpatent.com](http://www.gbpatent.com)

NEIL F. GREENBLUM  
BRUCE H. BERNSTEIN  
JAMES L. ROWLAND  
ARNOLD TURK  
MICHAEL J. FINK  
STEPHEN M. ROYLANCE ◊  
ROBERT W. MUELLER  
WILLIAM E. LYDDANE  
WILLIAM S. BOSHNIK \*  
PAUL A. BRAIER, Ph.D.  
P. BRANKO PEJIC \*  
JOHN PRETA \*  
DANIEL B. MOON  
BRUCE H. STONER, JR. ◊  
ENOCH PEAVEY  
SEAN C. MYERS-PAYNE, Ph.D.  
JONATHAN R. MILLER \*  
STEVEN B. POLLICOFF \*  
BARRY I. HOLLANDER ◊  
GARY V. HARKCOM \*◊  
JAMES P. BONNAMY  
JILL M. BROWNING  
WALTER SCHLAPKOHL, Ph.D.


NAOKO OHASHI \*  
HARRY J. GWINNELL ◊  
JEFFREY H. HANDELSMAN \*  
KENNETH H. SALEN ◊  
SOK K. HONG ◊  
TAI KONDO ◊  
JEFFREY R. BOUSQUET ◊  
GARY M. JACOBS ◊  
WILLIAM PIEPRZ ◊  
JAMES A. GROMADA  
SHAWN A. HAMIDINIA, Ph.D.  
ALI M. IMAM \*  
TARIK M. NABI, Ph.D.  
CHAD E. GORKA  
CHUONG T. NGUYEN \*  
JAMES A. DONEGAN ◊

\* ADMITTED TO A BAR  
OTHER THAN VA  
◊ REGISTERED PATENT AGENT  
◊ OF COUNSEL

July 10, 2020

VIA ECF and E-Mail

The Honorable Vernon S. Broderick  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

**APPLICATION GRANTED**  
**SO ORDERED**   
**VERNON S. BRODERICK**  
**U.S.D.J.** 7/13/2020

Defendants shall refile their Answer, incorporating Plaintiff's additional proposed redactions.

**Re: *Spectrum Dynamics Medical Limited v. General Electric Company, et al.,***  
**Civil Action No. 18-cv-11386 (VSB)**

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited ("Plaintiff" or "Spectrum") in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B of your Honor's Individual Rules & Practices in Civil Cases to respectfully request permission that Defendants' Answer, Affirmative Defenses, and Counterclaims be filed under seal and in redacted form.

On July 1, 2020, Defendants filed a similar letter motion pursuant to Rule 5.B requesting permission to file its Answer, Affirmative Defenses, and Counterclaims under seal and with certain redactions. *See* ECF Doc No. 78. The Court granted Defendants' request on July 2, 2020. *See* ECF Doc No. 83.

Plaintiff respectfully requests that certain additional redactions of limited nature affecting only two paragraphs of Defendants' Answer, Affirmative Defenses, and Counterclaims be permitted (paragraph 541 of Answer and paragraph 13 of Counterclaims). Plaintiff's proposed redactions are highlighted in blue in the enclosed copy of Defendants' Answer, Affirmative Defenses, and Counterclaims.

Plaintiff's first requested redaction relates to a GE patent number, which Spectrum alleges discloses Spectrum's trade secrets, and has been redacted in all previous pleadings.

The Honorable Vernon S. Broderick

July 10, 2020

Page -2-

Plaintiff's also seeks to redact a reference to one of its commercial transactions, which has not yet been made public, and Plaintiff considers to be confidential.

At or around the time Defendants filed their letter Motion, Defendants invited Plaintiff to propose additional redactions, if any. We have subsequently discussed Plaintiff's requested redactions with Defendants' counsel, who does not object to Plaintiff's additional requested redactions.

For the aforementioned reasons, Plaintiff respectfully requests that the Court allow the additional redactions of Defendants' Answer, Affirmative Defenses, and Counterclaims as indicated by Plaintiff, and permit the same to be filed under seal in redacted form.

Respectfully submitted,

*/s/ Neil F. Greenblum*

Neil F. Greenblum

cc: All counsel of record (via email and ECF)